



July 15, 2016

Dave Navecky
Surface Transportation Board
Docket No. FD 35952
395 E Street SW
Washington, DC 20423-0001

Public Comments from the Illinois Farm Bureau regarding Docket No. FD 35952

Dear Mr. Navecky:

I am pleased to submit comments on behalf of Illinois Farm Bureau, regarding the proposed Great Lakes Basin Rail (GLBR) project. Illinois Farm Bureau (IFB) is a member of American Farm Bureau Federation[®], a national organization of farmers and ranchers. Founded in 1916, IFB is a non-profit, membership organization controlled by farmers who join through their local County Farm Bureaus. With more than 80,000 farm family members, IFB represents two out of three Illinois farmers. Many of those families may be directly or indirectly impacted by this project. On behalf of the farmers, landowners, and members of the IFB, I would like to relay the following concerns we have regarding the proposed GLBR project.

The IFB requests that the STB conduct a full review of the transportation merits of the project. We understand that the STB typically grants exemptions from the full transportation review process if requested by an applicant. However, GLBR is not the typical applicant. Great Lakes Basin, LLC is a newly formed Limited Liability Company that has never operated as a rail carrier, yet seeks to construct the largest rail line proposed in 125 years (with an estimated \$8 billion price tag) to provide a by-pass for railroad freight traffic that currently moves through Chicago.

Although GLBR asserts that its project will provide major railroads “more efficient options to route trains through [Chicago]” and founder Frank Patton stated “that at least two, or really three or four” railroads need to use it, not one major railroad has publicly indicated its support for the proposed project. In March, Union Pacific told the Chicago Tribune that it carefully reviewed the proposal and is not interested in the GLBR project, and that “Union Pacific is focused on several major public-private partnerships, including CREATE, which will benefit the region and enhance efficiency for Chicago-area and regional railroad operations.” Norfolk Southern submitted a public comment in this docket informing the STB that it has “a robust route network, with multiple routes into and out of the Chicago area and also owns its own bypass route” and that it would not use the proposed GLBR rail line.



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1701 Towanda Avenue • P.O. Box 2901 • Bloomington, Illinois • 61702-2901
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It is widely acknowledged that there is rail congestion in Chicago, but the construction of a 280-mile bypass through irreplaceable highly productive Illinois farmland in Kankakee, Grundy, LaSalle, Lee, Ogle, Winnebago and Boone Counties warrants serious study to determine whether there is a public demand or need for GLBR's project. Passenger and freight rail congestion in the Chicago area has been studied extensively and the CREATE program was developed to improve the efficiency of the rail network in the Chicago area. We understand that CREATE has already reduced the time it takes a train to travel through the Chicago area and that more funding is needed to construct CREATE projects such as the 75th Street Corridor and Grand Crossing Projects. The Chicago Metropolitan Agency for Planning ("CMAP") recently commented in this docket that "the publicly available materials provided to date do not provide any analysis of the anticipated performance impacts of the proposed railroad, or of impacts on adjacent road and passenger rail networks". In light of the massive scope of the proposed project, the lack of support from potential customers, and the lack of transportation or other studies demonstrating the public need for the GLBR rail line, we request that the STB conduct a thorough evaluation of the project under the transportation merits review process.

GLBR also seeks approval from the STB of a "designated 50-foot utility corridor" as another source of revenue for GLBR, for possible use by utilities as a new right of way to serve potential future population growth of the region. One of GLBR's key design objectives is to "provide a utility corridor for improved electricity, water, natural gas, fiber optics, and wireless coverage, both to support railroad operations and to provide new options for our neighbors." Although revenue generation via a future utility corridor is one of GLBR's key objectives, the STB has jurisdiction to authorize construction of railroads and railroad facilities, and cannot authorize construction of a designated utility corridor for possible use in the future by utilities. GLBR's request to approve a potential "utility corridor" as part of a railroad project is blatantly unconstitutional and we respectfully request that the STB exclude GLBR's proposed utility corridor from the transportation merits review and environmental review processes.

Agriculture is an important part of the economy for Illinois. Based on the *2012 Census of Agriculture* data, the annual market value of agricultural products sold in Illinois was over \$17 billion. Illinois ranks among the top states in market of agricultural products sold. Nearly 20,000 acres of highly productive Illinois farmland will be lost and local communities dependent upon Illinois agriculture will suffer significant economic losses if the GLBR project is approved by the STB. Additional acreage will be required to construct flyovers, overpasses, and rail crossings, which means more highly productive farmland will be converted for non-farming uses. Construction of the GLBR railroad will sever Illinois farms and in some cases create uneconomical remnant parcels. Some farmland may be landlocked and inaccessible, while many farmers will suffer adverse travel as a result of the new railroad and road closures. Irrigation, tile drainage systems, and drainage patterns will also be impacted by the project. In light of the negative impact this project poses for Illinois agriculture, we urge the STB to thoroughly examine the impacts of the proposed GLBR project as required by the Farmland Protection Policy Act (FPPA) and the National Environmental Policy Act (NEPA).

GLBR's proposed project does not utilize existing rail infrastructure and if approved as requested, it will directly impact nearly 5,000 acres of mostly prime Illinois farmland for the rail line and an additional 14,700 acres of prime farmland for a "railport". The draft Scope of Study identifies 16 impact areas, including land use, geology and soils but does not include *agricultural impacts* as a category. Since GLBR's proposal impacts farmland more than any category included in the draft Scope of Study, we request that the draft EIS include a category for *agricultural impacts* to address the potential direct, indirect and cumulative impacts of GLBR's project on agriculture.

As part of the *agricultural impacts* evaluation, the FPPA requires evaluation of the following areas in order to determine the effect of GLBR's project on farmland, what farmland that is suitable for protection, and when alternative alignments should be considered by the STB:

- the total number of acres of farmland that would be converted to a different use;
- the total number of acres of prime and important farmland directly impacted by the project;
- the percentage of farmland within a County that would be converted;
- the total number of acres of farmland enrolled in conservation programs or other federal and state programs;
- the number of agriculture parcel severances, uneconomical remnants, landlocked parcels and adverse travel that will be created by the project;
- the number of rural residences and farm buildings which will be relocated;
- the presence of substantial on-farm investments such as barns, storage buildings, fencing, drainage, irrigation, waterways, or other soil and conservation measures;
- the total number of acres of off-site agricultural land converted by the project for required borrow material, roads, mitigation, erosion and flooding.

That analysis should further consider how these farmland impacts influence the area's farm logistics, economics, and social well-being.

GLBR's plan to construct the 280-mile mainline with a 1% ruling grade, along with the construction of flyovers, overpasses, and river crossings will increase the risk of flooding, cause soil erosion and will change the existing drainage patterns on all of the farmland adjacent to the railroad. The vast majority of the farmland that will be impacted by this project is drained by tile. Construction of the project will impact existing agricultural drain tile systems, and as part of the *agricultural impacts* evaluation, the EIS must analyze the direct and indirect impacts of GLBR's project on drainage patterns and agricultural drain tile systems.

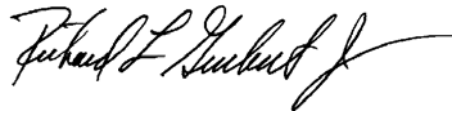
Finally, we urge the STB to evaluate whether GLBR's project is needed in light of the existing rail infrastructure in the Chicago Region, the CREATE projects, and the failure of any customer to publicly indicate that they will use GLBR's proposed toll rail line. Railroads own their own rail lines, and it does not appear that any railroad is willing to pay the toll for GLBR's proposed rail line. We respectfully request that the STB conduct a full review of the transportation merits

of GLBR's proposed rail line and issue a decision prior to completion of the environmental review process.

I appreciate this opportunity to provide comments.

Sincerely,

ILLINOIS FARM BUREAU®

A handwritten signature in cursive script, reading "Richard L. Guebert, Jr.", with a long horizontal flourish extending to the right.

Richard L. Guebert, Jr.
President